

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:	Chapter 11
<b>LTL MANAGEMENT, LLC,<sup>1</sup></b>	Case No.: 23-12825 (MBK)
Debtor.	Honorable Michael B. Kaplan
LTL MANAGEMENT LLC,	
Plaintiff,	
v.	Adv. Proc. No.: 23-01092 (MBK)
THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,	
Defendants.	

**APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF**

The applicant, the Official Committee of Talc Claimants (the “**TCC**” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “**LTL**”), by and through its proposed counsel, having filed substantially contemporaneously with this Application the *Motion to Seal the Redacted Portions of the Objection of the Official Committee of Talc Claimants to Debtor’s Motion for an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction* (respectively, the “Objection” [Adv. Pro. Dkt. No. 39] and the “Motion” [Adv. Pro. Dkt. No. 2]) filed in the above-captioned adversary proceeding (the “**Motion to Seal**”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. Substantially contemporaneously with the filing of the Motion to Seal, the Committee filed a redacted version of its Objection.<sup>1</sup> **The return date on the Debtor's Motion is currently scheduled for April 18, 2023 at 10:00 a.m.**

2. As set forth in the Motion to Seal, the redacted portions of the Objection include certain information designated by the Debtor as being confidential in accordance with that certain proposed *Agreed Protective Order Governing Confidential Information by and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(b)* (the "Proposed Protective Order"<sup>2</sup>). For purposes of submitting its Objection in a timely manner, the Committee is, at this time, respecting the Debtors' confidentiality designations (collectively, the "Confidential Information"), subject to the terms of the Proposed Protective Order (with all of the Committee's rights thereunder being expressly preserved).

3. By this Application, the Committee respectfully requests that, in accordance with this Court's *Process to Electronically Request that a Document be Sealed* (Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)), the hearing on the Motion to Seal be scheduled on the same date and time as the current return date on the Debtor's Motion, which is April 18, 2023 at 10:00 a.m.

4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

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<sup>1</sup> A redacted version of the Objection has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court's procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

<sup>2</sup> As of the submission of this Motion to Seal, the Proposed Protective Order has not been finalized for submission to the Court.

**WHEREFORE**, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: April 17, 2023

**GENOVA BURNS LLC**

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